

EXHIBIT 10

Pursuant to Local Rule 5.3(A), exhibits attached hereto have been redacted to protect the personal privacy of individuals, including dates of birth and social security numbers.

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES ROBINSON,

Plaintiff,

v.

TELESECTOR RESOURCES GROUP, INC. D/B/A
VERIZON SERVICES GROUP,

Defendant.

Civil Action No. 04-11964-NG

AFFIDAVIT OF CLAUDIA D'AMATO

I, Claudia D'Amato, hereby depose and say as follows:

1. I was born on 1950.

2. I was employed by Verizon Communications Inc. and its predecessors from November 1972 to November 2003. From May 2000 until December 2001, I was employed as a second-level manager in Verizon's National Markets Center – Complex Services Department center located at 6 Bowdoin Square, Boston, Massachusetts (the "NMC"). At that time I reported to Director Patrick Stevens.

3. My responsibilities included managing five (5) Team Leaders. Each Team Leader was in turn responsible managing the activities of associates responsible for preparing and tracking service orders for Competitive Local Exchange Carriers ("CLECs"); motivating and leading the team members to meet customer and corporate objectives; and interfacing with customers to assure critical dates were met and customer satisfaction was achieved. Each Team Leader supervised between 12 and 15 service representatives.

Redacted

4. At or around the same time I joined the NMC, Charles Robinson also joined the NMC, as a Team Leader reporting to second-level manager Henry ("Hank") Pilat. I had known Mr. Robinson prior to joining the NMC, when I was a project manager in Verizon's predecessor's Wholesale organization and Mr. Robinson was a first-level manager in Engineering.

5. On several occasions Mr. Robinson told me that when he was asked questions by his employees, Mr. Robinson would often reply with "Pretend I am not here - what would you do?" or words to that effect. On a number of occasions Mr. Robinson's employees approached me for answers after failing to receive sufficient guidance from Mr. Robinson.

6. On one occasion Mr. Robinson gave me a copy of a cartoon showing a unicorn and other animals, with handwritten captions associating each of the animals with specific NMC members, including myself. Mr. Robinson never said anything to me that suggested that he was upset or offended by that cartoon or that the cartoon referred in any way to his age.

7. As of June 2001, there were twelve (12) Team Leaders in the NMC. In June 2001, our Director, Patrick Stevens, advised Pilat and I that due to decreasing work volume we would be required to eliminate one Team Leader position. Stevens told Pilat and I that we would need to determine which eleven of the twelve Team Leaders to retain.

8. In late June or early July 2001, I attended a meeting with the Team Leaders regarding the upcoming reduction in force. During the meeting, Pilat and I advised the Team Leaders that one of their positions was going to be eliminated and asked the Team Leaders to update their internal Verizon resumes to reflect their recent accomplishments, as those resumes would be considered in the selection process.

9. After receiving the resumes from Mr. Robinson and the other Team Leaders, Pilat and I met on several occasions to discuss each of the Team Leaders in order to determine which Team Leaders to retain for the remaining positions. We based our review on the resumes completed by the Team Leaders, as well as our personal knowledge of the performance of each of the Team Leaders. Following that review, Pilat and I determined that Mr. Robinson was the least valuable member of the Team Leader staff, and consequently would not be selected for one of the remaining eleven Team Leader positions. In or around late July 2001 we advised Patrick Stevens of our decision.

10. At no time did I consider Mr. Robinson's age in this decision or any employment decision relating to Mr. Robinson. Nor am I aware of any facts to suggest that Pilat considered Mr. Robinson's age in deciding not to select Mr. Robinson for one of the remaining Team Leader positions.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 20th DAY
OF OCTOBER, 2005.

Claudia D'Amato
Claudia D'Amato